

EMCSF 13.1
12/19/02

December 19, 2002

Ms. Linda Meyer
U.S. EPA Region X
1200 6th Ave
M.S. WCN-121
Seattle, Washington 98101

**Re: IDEQ Comments on the, Remedial Design Report and Remedial
Action Work Plan, Dewatering Pit Solids Removal, Simplot Plant
Area, Eastern Michaud Flats Superfund Site, November 25, 2002**

Dear Ms. Meyer:

The Idaho Department of Environmental Quality (DEQ) has reviewed the above mentioned report and offer the following comments.

The DEQ is in general agreement with the revised method to demonstrate compliance with performance standards is more adequate. The DEQ approves of using 11 mg/Kg of arsenic and 2.4 mg/Kg of beryllium as the confirmation standard. The DEQ however, does not agree that only these concentrations should be reported. We therefore request that all chemicals of concern be analyzed for and the concentrations reported.

The DEQ also takes exception that in section 3.2 of the report that the excavation apparently will terminate at a total depth of three feet below the visually identified residual solids. Even if the arsenic and beryllium concentrations exceed the confirmation standard. This seems to limit the removal of contaminated soil resulting from leaching. We request that all remaining soil meet the confirmation standard.

The DEQ would also request that an additional grab sample be collected from each of the sampling locations. We make this request to verify that hot spots are not missed through composting all the samples.

Please contact me at (208) 236-6160 if you have any questions or concerns regarding this matter.

Sincerely,

Douglas M. Tanner



Regional Environmental Manager

C: Tiffany Floyd, DEQ-Pocatello
Dean Nygard, DEQ-Boise
Ward Wooleesen, Simplot-Boise
Roger Turner, Shoshone Bannock Tribes